UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 8, 2021

VIA CERTIFIED MAIL

Ms. Kim Johnson, Mayor of Thomas
Operator or Agent of: City of Thomas WWTP
City of Thomas
P.O. Box 248
307 Spruce Street
Thomas, WV 26292

RE: CWA Section 308 Information Requirement

Dear Ms. Johnson / Operator or Agent of the City of Thomas WWTP:

The United States Environmental Protection Agency ("EPA") hereby requires that the City of Thomas ("City") provide certain information regarding its Wastewater Treatment Plant ("Thomas WWTP") located at P.O. Box 248, 307 Spruce Street in Thomas, WV. EPA requires this information as a part of its investigation of the Thomas WWTP's compliance with the Clean Water Act ("CWA"), 33 U.S.C. § 1251, and the regulations promulgated thereunder.

Compliance with this Information Requirement is mandatory. Failure to respond fully and truthfully to the Information Requirement in accordance with deadlines set forth in the Information Requirement, or to adequately justify such failure to respond, can result in enforcement action by EPA pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. Please note that the provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

The Thomas WWTP is entitled to assert a business confidentiality claim, covering all or part of the information which this letter requires. Any such claim should be made in accordance with the procedures described at 40 C.F.R. § 2.203(b). In the event that the Thomas WWTP asserts a claim of business confidentiality with respect to any document, the Thomas WWTP should provide EPA with a redacted version of the document which does not contain any claimed business confidential information and which can be distributed to the public if requested. EPA will provide the public with information subject to a claim of business confidentiality only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless a confidentiality claim is asserted at the time the required information is provided, EPA may make this information available to the public without further notice to Thomas WWTP.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501.

If you have any factual questions concerning this information request, please contact Ms. Allison Gieda at Gieda.Allison@epa.gov or 304-234-0232.

Sincerely,

Richard A. Rogers

Digitally signed by Richard A. Rogers
Date: 2021.06.08 11:08:42 -04'00'

Rick Rogers, Chief
Water Branch
Enforcement and Compliance Assurance Division

Enclosures

cc: Brad Wright, WVDEP (Brad.M.Wright@wv.gov)
Jeremy Bandy, WVDEP (Jeremy.W.Bandy@wv.gov)
Allison Gieda, EPA
Rebecca Serfass, EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

In the Matter of:	:	
	:	Proceeding under Section 308 of the
	:	Clean Water Act, 33 U.S.C. § 1318
City of Thomas	:	
Wastewater Treatment Plant	:	
P.O. Box 248	:	
307 Spruce Street	:	
Thomas, WV 26292	:	
	:	
	:	
	:	
	:	**INFORMATION REQUIREMENT**
Respondent	:	
	:	
	:	

I. STATUTORY AUTHORITY

1. This Information Requirement is issued under the authority vested in the United States Environmental Protection Agency (EPA) by Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318. The Administrator of the EPA has delegated this authority to the Regional Administrator of EPA Region III who in turn has delegated it to the Director of the Enforcement and Compliance Assurance Division of EPA Region III, who in turn has delegated it to the Chief of the Water Branch. EPA hereby requires the City of Thomas Wastewater Treatment Plant ("Thomas WWTP" or "Respondent") to provide the information specified below.

II. STATUTORY AND REGULATORY BACKGROUND

2. EPA is authorized under Section 308 of the CWA, 33 U.S.C. § 1318, to require owners and operators of point sources to establish records and make such reports as may be necessary to carry out the purpose of the CWA, including but not limited to:

   a. developing or assisting in the development of any effluent limitation, or other limitation, prohibition, effluent standard, pretreatment standard, or standard of performance under the CWA;

   b. determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance;

c. any requirement under Section 308 of the CWA; and

d. carrying out Sections 305, 311, 402, 404, and 504 of the CWA.

3. Failure to respond as directed to a CWA Section 308 Information Requirement is punishable under the civil and criminal provisions of Section 309 of the CWA, which provide for the assessment of penalties, injunctive relief and imprisonment. Providing misleading or false information may subject you to civil and criminal sanctions. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

4. You may assert a business confidentiality claim covering all or part of the information submitted in response to this Requirement in the manner described in 40 C.F.R. Part 2 Subsection B. Information covered by a business confidentiality claim will be disclosed by EPA only to the extent and by means of the procedures set forth in Subpart B, 40 C.F.R. Part 2. If no claim of confidentiality accompanies the information submitted when it is received by EPA, it may be made available to the public by EPA without further notice. You may not withhold any information from EPA on the grounds that it is confidential business information.

5. This inquiry is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act 44 U.S.C. Chapter 35. (See 5 C.F.R. Section 1320.3(c)).

6. This Information Requirement does not preclude EPA from performing inspections.

III. INSTRUCTIONS

7. Provide a separate narrative response for each question set forth below and for each subpart of each question.

8. Identify each answer with the corresponding number of the question and subpart to which it responds.

9. State the name, address, email address, telephone number, and occupation of each person providing responses, or contributing information to responses, to each request for information below.

10. Provide all documents in your possession which relate to the responses given. With respect to each document, identify the date, author, addressee, current location, and custodian and identify the question or subpart to which it relates.

11. Answer each question to the extent possible. If any question cannot be answered in full, explain why to the extent possible. If your responses are qualified in any manner, please explain.

12. If information or documents unknown or unavailable to you as of the date of your response to this request become known or available to you after submitting your response to the request, you must supplement your response to EPA. Moreover, should you find at any time afer the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide a

corrected response.

13. Each submission pursuant to this request must be accompanied by the following certification and must be signed by a representative of Thomas WWTP authorized to respond on behalf of that entity.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations."

Signed: _____
Title: _____
Date: _____

14. All information shall be submitted **within thirty (30) days** of receipt of this Information Requirement electronically to:

Allison Gieda
Enforcement and Compliance Assurance Division
Philadelphia, PA 19103-2029
Gieda.Allison@epa.gov

If you are unable to send requested documentation electronically, please contact Allison Gieda via phone or email to discuss alternate delivery methods. In both your message and written response, please indicate the specific information requested by EPA that you are unable to provide electronically.

15. If you have questions regarding this Information Requirement, you may contact Allison Gieda of the Enforcement and Compliance Assurance Division at Gieda.Allison@epa.gov or 304-234-0232.

IV. INFORMATION REQUIREMENT

The Respondent is hereby required, pursuant to Section 308 of the CWA, 33 U.S.C § 1318, to submit the following information to EPA **within thirty (30) calendar days** of receipt of this Information Requirement:

16. Provide a description of the Thomas WWTP covered by NPDES Permit No. WV0024856, including but not limited to, a narrative description of all wastewater flows, all tanks including the LMET tank, operational processes and water pollution control equipment.

    a. Include in your response a WWTP process flow schematic/diagram showing all wastewater streams, the location of any points of sampling, including internal monitoring points, and point(s) of discharge in addition to a site map that includes the LMET tank and all outfall locations.

17. Attached below is a spreadsheet with exceedances of effluent limitations contained in NPDES Permit No. WV0024856 identified in EPA's data systems for the period May 1, 2016 through March 31, 2021 and based on discharge monitoring reports (DMR) submitted by Thomas WWTP. Please identify any additional effluent exceedances for the period not identified on the spreadsheet.

18. For each exceedance identified in Paragraph 17, provide a detailed narrative description of the cause of the exceedance and any measure you have taken or intend to take to correct the exceedance or prevent future exceedances. Include completed or scheduled dates for each identified measure. If applicable, include noncompliance notifications submitted to the West Virginia Department of Environmental Protection (WVDEP).

19. Provide copies of any documents identified in or in support of your responses to questions 16-18, including copies of DMRs for violations identified in Paragraph 17.

20. Provide copies of any notices of noncompliance and any enforcement actions issued by WVDEP for the violations identified in Paragraph 17.

21. Provide any additional information related to violations that impact the current compliance status at the Thomas WWTP, other than those exceedances identified in Paragraph 17.

22. Indicate the name and title of the person(s) responsible for operating the Thomas WWTP, including whether they are full-time or part-time employees, a description of the training each operator has received to qualify them for the position(s) including copies of all wastewater operator certification(s), and the dates that each operator has been in the position.

23. Provide a list of all dates that Thomas WWTP accepted leachate from the Tucker County Landfill for the time period of November 18, 2017 through April 14, 2017 and from November 16, 2018 through the date of receipt of this letter. Include all records and documentation in support of your response.

24. In regards to leachate discharged from the LMET tank, or otherwise introduced into the Thomas WWTP treatment process, provide the following:

    a. A list of all dates that Thomas WWTP discharged leachate from the LMET tank, or otherwise introduced leachate from the Tucker County Landfill into the Thomas WWTP treatment process, for the time period of November 18, 2017 through April 14, 2017 and from November 16, 2018 through the date of receipt of this letter.

    b. The amount, in gallons per day, that leachate was discharged from the LMET tank, or otherwise introduced leachate from the Tucker County Landfill into the Thomas WWTP treatment process, for each day specified in Paragraph 24(a) above.

    c. All records and documentation in support of your responses to questions 24.a. and 24.b. above.

    d. Documentation on all analytical testing performed on the Tucker County Landfill leachate being introduced to the Thomas WWTP and the results of all such analytical testing for the time period specified in Paragraph 24(a) above.

V. EFFECTIVE DATE

This INFORMATION REQUIREMENT is effective upon receipt.

Date: 6/8/21

Richard A. Rogers

Digitally signed by Richard A. Rogers
Date: 2021.06.08 11:08:25 -04'00'

Richard A. Rogers, Chief
Water Branch
Enforcement and Compliance Assurance Division

ATTACHMENT 1
Effluent Limit Exceedances Report

WV0024856: City of Thomas Wastewater Treatment Plant, Thomas, WV 26292
Monitoring Period Date Range: 05/01/2016 through March 31, 2021

Monitoring Period Date	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Unit
5/31/2016	1	Oxygen, dissolved (DO)	INST MIN	4.6	mg/L	6	mg/L
5/31/2016	1	Nitrogen, ammonia total (as N)	MO AVG	8.32	mg/L	5.7	mg/L
5/31/2016	1	Nitrogen, ammonia total (as N)	MO AVG	3.501134	kg/d	2.267574	kg/d
5/31/2016	1	BOD, 5-day, percent removal	MO AV MN	76	%	85	%
5/31/2016	1	Solids, suspended percent removal	MO AV MN	48	%	85	%
6/30/2016	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
6/30/2016	1	Nitrogen, ammonia total (as N)	MO AVG	12	mg/L	5.7	mg/L
6/30/2016	1	Nitrogen, ammonia total (as N)	MO AVG	2.276644	kg/d	2.267574	kg/d
6/30/2016	1	Nitrogen, ammonia total (as N)	DAILY MX	13.8	mg/L	13	mg/L
6/30/2016	1	Iron, total recoverable	MO AVG	1.41	mg/L	1.23	mg/L
6/30/2016	1	Copper, total recoverable	MO AVG	0.00616	mg/L	0.0049	mg/L
6/30/2016	1	Solids, suspended percent removal	MO AV MN	69	%	85	%
7/31/2016	1	Oxygen, dissolved (DO)	INST MIN	4.6	mg/L	6	mg/L
7/31/2016	1	Nitrogen, ammonia total (as N)	MO AVG	7.65	mg/L	5.7	mg/L
8/31/2016	1	Oxygen, dissolved (DO)	INST MIN	4.7	mg/L	6	mg/L
8/31/2016	1	Nitrogen, ammonia total (as N)	MO AVG	6	mg/L	5.7	mg/L
9/30/2016	1	Oxygen, dissolved (DO)	INST MIN	4.8	mg/L	6	mg/L
10/31/2016	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
11/30/2016	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
11/30/2016	1	Iron, total recoverable	MO AVG	38.1	mg/L	1.23	mg/L
11/30/2016	1	Iron, total recoverable	DAILY MX	38.1	mg/L	2.15	mg/L
11/30/2016	1	Aluminum, total recoverable	DAILY MX	3.2	mg/L	0.75	mg/L
11/30/2016	1	Aluminum, total recoverable	MO AVG	3.2	mg/L	0.326	mg/L
12/31/2016	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
12/31/2016	1	Solids, suspended percent removal	MO AV MN	60	%	85	%
1/31/2017	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
2/28/2017	1	Oxygen, dissolved (DO)	INST MIN	4.03	mg/L	6	mg/L
2/28/2017	1	Iron, total recoverable	MO AVG	1.69	mg/L	1.23	mg/L
3/31/2017	1	Oxygen, dissolved (DO)	INST MIN	4.6	mg/L	6	mg/L
3/31/2017	1	BOD, 5-day, 20 deg. C	MO AVG	31.5	mg/L	30	mg/L
3/31/2017	1	Solids, total suspended	MO AVG	37	mg/L	30	mg/L
3/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	11.8	mg/L	9.2	mg/L
3/31/2017	1	BOD, 5-day, percent removal	MO AV MN	80	%	85	%
4/30/2017	1	Oxygen, dissolved (DO)	INST MIN	4.5	mg/L	6	mg/L
4/30/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	27.06	mg/L	18.4	mg/L
4/30/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	17.2	mg/L	9.2	mg/L
4/30/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	5.333333	kg/d	5.21542	kg/d
4/30/2017	1	Copper, total recoverable	MO AVG	0.00487	mg/L	0.0047	mg/L
4/30/2017	1	Solids, suspended percent removal	MO AV MN	71	%	85	%
5/31/2017	1	Oxygen, dissolved (DO)	INST MIN	4.6	mg/L	6	mg/L

5/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	4.943311	kg/d	3.219955	kg/d
5/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	18.4	mg/L	5.7	mg/L
5/31/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	23.3	mg/L	11.4	mg/L
5/31/2017	IU01	Cyanide, total (as CN)	DAILY MX	0.5	mg/L	0.03	mg/L
5/31/2017	IU01	Chromium, total (as Cr)	DAILY MX	0.5	mg/L	0.07	mg/L
5/31/2017	IU01	Copper, total (as Cu)	DAILY MX	0.5	mg/L	0.02	mg/L
5/31/2017	IU01	Lead, total (as Pb)	DAILY MX	0.5	mg/L	0.01	mg/L
5/31/2017	IU01	Nickel, total (as Ni)	DAILY MX	0.5	mg/L	0.087	mg/L
5/31/2017	IU01	Zinc, total (as Zn)	DAILY MX	0.5	mg/L	0.15	mg/L
5/31/2017	IU01	Cadmium, total recoverable	DAILY MX	0.5	mg/L	0.0019	mg/L
5/31/2017	IU01	Mercury, total (as Hg)	DAILY MX	0.0005	mg/L	0.0001	mg/L
6/30/2017	1	Oxygen, dissolved (DO)	INST MIN	5.6	mg/L	6	mg/L
6/30/2017	1	BOD, 5-day, 20 deg. C	MO AVG	15.19728	kg/d	12.47166	kg/d
6/30/2017	1	BOD, 5-day, 20 deg. C	MO AVG	25	mg/L	22	mg/L
6/30/2017	1	BOD, 5-day, 20 deg. C	DAILY MX	27.30794	kg/d	24.94331	kg/d
6/30/2017	1	Solids, total suspended	MO AVG	46	mg/L	30	mg/L
6/30/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	919.7279	kg/d	6.439909	kg/d
6/30/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	13.45	mg/L	5.7	mg/L
6/30/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	4.929705	kg/d	3.219955	kg/d
6/30/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	17.9	mg/L	11.4	mg/L
6/30/2017	1	Copper, total recoverable	MO AVG	0.01226	mg/L	0.0047	mg/L
6/30/2017	1	Solids, suspended percent removal	MO AV MN	54	%	85	%
6/30/2017	IU01	Flow rate	DAILY MX	0.022184	MGD	0.02	MGD
7/31/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	21.7	mg/L	11.4	mg/L
7/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	5.251701	kg/d	3.219955	kg/d
7/31/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	9.147392	kg/d	6.439909	kg/d
7/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	18.35	mg/L	5.7	mg/L
7/31/2017	1	Iron, total recoverable	MO AVG	1.44	mg/L	1.23	mg/L
7/31/2017	IU01	Nitrogen, Kjeldahl, total (as N)	DAILY MX	17.77778	kg/d	14.51247	kg/d
7/31/2017	IU01	Iron, total (as Fe)	DAILY MX	16.2	mg/L	9	mg/L
7/31/2017	IU01	Cadmium, total recoverable	DAILY MX	0.006	mg/L	0.0019	mg/L
8/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	16.56	mg/L	5.7	mg/L
8/31/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	22.6	mg/L	11.4	mg/L
8/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	3.482993	kg/d	3.219955	kg/d
8/31/2017	1	Iron, total recoverable	DAILY MX	2.57	mg/L	2.19	mg/L
8/31/2017	1	Iron, total recoverable	MO AVG	2.57	mg/L	1.23	mg/L
8/31/2017	1	Copper, total recoverable	MO AVG	0.00649	mg/L	0.0047	mg/L
9/30/2017	IU01	Nitrogen, Kjeldahl, total (as N)	DAILY MX	44.6712	kg/d	14.51247	kg/d
9/30/2017	IU01	Iron, total (as Fe)	DAILY MX	22.3	mg/L	9	mg/L
10/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	7.45	mg/L	5.7	mg/L
10/31/2017	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	12.1	mg/L	11.4	mg/L
10/31/2017	1	Copper, total recoverable	MO AVG	0.00683	mg/L	0.0047	mg/L
10/31/2017	IU01	Chromium, total (as Cr)	DAILY MX	0.11	mg/L	0.07	mg/L
11/30/2017	1	BOD, 5-day, 20 deg. C	MO AVG	33.5	mg/L	30	mg/L
11/30/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	11.87	mg/L	9.2	mg/L
11/30/2017	1	Copper, total recoverable	MO AVG	0.00655	mg/L	0.0047	mg/L
11/30/2017	1	BOD, 5-day, percent removal	MO AV MN	63	%	85	%

11/30/2017	1	Solids, suspended percent removal	MO AV MN	74	%	85	%
12/31/2017	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	11.97	mg/L	9.2	mg/L
12/31/2017	1	Copper, total recoverable	MO AVG	0.0083	mg/L	0.0047	mg/L
1/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	34.4	mg/L	18.4	mg/L
1/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	22.8	mg/L	9.2	mg/L
1/31/2018	1	Copper, total recoverable	MO AVG	0.01336	mg/L	0.0047	mg/L
2/28/2018	1	Oxygen, dissolved (DO)	INST MIN	4.4	mg/L	6	mg/L
2/28/2018	1	BOD, 5-day, 20 deg. C	MO AVG	36.5	mg/L	30	mg/L
2/28/2018	1	Solids, total suspended	MO AVG	32	mg/L	30	mg/L
2/28/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	13.55	mg/L	9.2	mg/L
3/31/2018	1	Oxygen, dissolved (DO)	INST MIN	5.6	mg/L	6	mg/L
3/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	22	mg/L	18.4	mg/L
3/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	20.13	mg/L	9.2	mg/L
3/31/2018	1	Iron, total recoverable	MO AVG	1.36	mg/L	1.23	mg/L
3/31/2018	1	Copper, total recoverable	MO AVG	0.0054	mg/L	0.0047	mg/L
4/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	5.219955	kg/d	5.21542	kg/d
4/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	14.6	mg/L	9.2	mg/L
5/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	25.8	mg/L	5.7	mg/L
5/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	11.85941	kg/d	6.439909	kg/d
5/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	37.8	mg/L	11.4	mg/L
5/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	7.997732	kg/d	3.219955	kg/d
5/31/2018	1	Iron, total recoverable	DAILY MX	2.96	mg/L	2.19	mg/L
5/31/2018	1	Iron, total recoverable	MO AVG	2.96	mg/L	1.23	mg/L
5/31/2018	1	Copper, total recoverable	MO AVG	0.00898	mg/L	0.0047	mg/L
5/31/2018	IU01	Iron, total (as Fe)	DAILY MX	10.5	mg/L	9	mg/L
6/30/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	46.1	mg/L	11.4	mg/L
6/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	34.3	mg/L	5.7	mg/L
6/30/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	13.59637	kg/d	6.439909	kg/d
6/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	9.578231	kg/d	3.219955	kg/d
6/30/2018	1	Copper, total recoverable	MO AVG	0.00544	mg/L	0.0047	mg/L
6/30/2018	IU01	Iron, total (as Fe)	DAILY MX	10.9	mg/L	9	mg/L
7/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	3.706576	kg/d	3.219955	kg/d
7/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	20.13	mg/L	5.7	mg/L
7/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	24.1	mg/L	11.4	mg/L
7/31/2018	1	Copper, total recoverable	MO AVG	0.00499	mg/L	0.0047	mg/L
7/31/2018	IU01	Iron, total (as Fe)	DAILY MX	17.7	mg/L	9	mg/L
8/31/2018	1	BOD, 5-day, 20 deg. C	MO AVG	24.5	mg/L	22	mg/L
8/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	9.936508	kg/d	6.439909	kg/d
8/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	19.2	mg/L	5.7	mg/L
8/31/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	26.2	mg/L	11.4	mg/L
8/31/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	4.820862	kg/d	3.219955	kg/d
9/30/2018	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
9/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	3.245351	kg/d	3.219955	kg/d
9/30/2018	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	8.3	mg/L	5.7	mg/L
9/30/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	14.7	mg/L	11.4	mg/L
9/30/2018	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	6.504762	kg/d	6.439909	kg/d
9/30/2018	1	Copper, total recoverable	MO AVG	0.00562	mg/L	0.0047	mg/L

9/30/2018	1	Solids, suspended percent removal	MO AV MN	79	%	85	%
10/31/2018	IU01	Iron, total (as Fe)	DAILY MX	9.77	mg/L	9	mg/L
11/30/2018	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
12/31/2018	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
12/31/2018	1	BOD, 5-day, percent removal	MO AV MN	79	%	85	%
12/31/2018	1	Solids, suspended percent removal	MO AV MN	71	%	85	%
1/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	11.48	mg/L	9.2	mg/L
1/31/2019	1	Solids, suspended percent removal	MO AV MN	80	%	85	%
2/28/2019	1	Copper, total recoverable	MO AVG	0.0069	mg/L	0.0047	mg/L
2/28/2019	1	Solids, suspended percent removal	MO AV MN	70	%	85	%
3/31/2019	1	Solids, total suspended	MO AVG	47	mg/L	30	mg/L
3/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	13.4	mg/L	9.2	mg/L
3/31/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	22.7	mg/L	18.4	mg/L
3/31/2019	1	Copper, total recoverable	MO AVG	0.0049	mg/L	0.0047	mg/L
3/31/2019	1	BOD, 5-day, percent removal	MO AV MN	76	%	85	%
3/31/2019	1	Solids, suspended percent removal	MO AV MN	72	%	85	%
4/30/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	14.43	mg/L	9.2	mg/L
4/30/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	28	mg/L	18.4	mg/L
4/30/2019	1	Iron, total recoverable	DAILY MX	2.57	mg/L	2.19	mg/L
4/30/2019	1	Iron, total recoverable	MO AVG	2.57	mg/L	1.23	mg/L
4/30/2019	1	Copper, total recoverable	MO AVG	0.0051	mg/L	0.0047	mg/L
5/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	8.12	mg/L	5.7	mg/L
5/31/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	11.5	mg/L	11.4	mg/L
6/30/2019	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
6/30/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	5.227211	kg/d	3.219955	kg/d
6/30/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	21	mg/L	11.4	mg/L
6/30/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	18.58	mg/L	5.7	mg/L
6/30/2019	1	Iron, total recoverable	MO AVG	1.24	mg/L	1.23	mg/L
6/30/2019	1	Copper, total recoverable	MO AVG	0.0058	mg/L	0.0047	mg/L
7/31/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	11.37687	kg/d	6.439909	kg/d
7/31/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	31.9	mg/L	11.4	mg/L
7/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	5.828118	kg/d	3.219955	kg/d
7/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	23.68	mg/L	5.7	mg/L
7/31/2019	1	Copper, total recoverable	MO AVG	0.0072	mg/L	0.0047	mg/L
8/31/2019	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
8/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	9.225	mg/L	5.7	mg/L
8/31/2019	1	Copper, total recoverable	MO AVG	0.0054	mg/L	0.0047	mg/L
9/30/2019	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
9/30/2019	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	11.51	mg/L	11.4	mg/L
9/30/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	8.6	mg/L	5.7	mg/L
10/31/2019	1	Copper, total recoverable	MO AVG	0.0059	mg/L	0.0047	mg/L
11/30/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	9.325	mg/L	9.2	mg/L
11/30/2019	1	Copper, total recoverable	MO AVG	0.0062	mg/L	0.0047	mg/L
11/30/2019	1	Solids, suspended percent removal	MO AV MN	81	%	85	%
12/31/2019	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	10.26	mg/L	9.2	mg/L
12/31/2019	1	BOD, 5-day, percent removal	MO AV MN	81	%	85	%
12/31/2019	1	Solids, suspended percent removal	MO AV MN	72	%	85	%

1/31/2020	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
1/31/2020	1	BOD, 5-day, 20 deg. C	MO AVG	35	mg/L	30	mg/L
1/31/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	13.05	mg/L	9.2	mg/L
2/29/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	12.725	mg/L	9.2	mg/L
2/29/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	12.88027	kg/d	10.43084	kg/d
3/31/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	17.05	mg/L	9.2	mg/L
3/31/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	19.9	mg/L	18.4	mg/L
4/30/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	15.76	mg/L	9.2	mg/L
4/30/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	22.8	mg/L	18.4	mg/L
4/30/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	6.653061	kg/d	5.21542	kg/d
4/30/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	10.96145	kg/d	10.43084	kg/d
5/31/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	19.93	mg/L	5.7	mg/L
5/31/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	35.1	mg/L	11.4	mg/L
5/31/2020	1	Iron, total recoverable	MO AVG	1.68	mg/L	1.23	mg/L
6/30/2020	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
6/30/2020	1	BOD, 5-day, 20 deg. C	MO AVG	39.1	mg/L	22	mg/L
6/30/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	39.8	mg/L	11.4	mg/L
6/30/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	25.92	mg/L	5.7	mg/L
6/30/2020	1	Iron, total recoverable	MO AVG	2.16	mg/L	1.23	mg/L
6/30/2020	1	Copper, total recoverable	MO AVG	0.0048	mg/L	0.0047	mg/L
7/31/2020	1	BOD, 5-day, 20 deg. C	MO AVG	36.7	mg/L	22	mg/L
7/31/2020	1	BOD, 5-day, 20 deg. C	DAILY MX	68.4	mg/L	44	mg/L
7/31/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	10.83	mg/L	5.7	mg/L
7/31/2020	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	17.2	mg/L	11.4	mg/L
7/31/2020	1	Copper, total recoverable	MO AVG	0.007	mg/L	0.0047	mg/L
9/30/2020	1	BOD, 5-day, 20 deg. C	MO AVG	32.55	mg/L	22	mg/L
9/30/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	7.45	mg/L	5.7	mg/L
9/30/2020	1	Copper, total recoverable	MO AVG	0.0062	mg/L	0.0047	mg/L
10/31/2020	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
10/31/2020	1	BOD, 5-day, 20 deg. C	MO AVG	22.85	mg/L	22	mg/L
10/31/2020	1	Copper, total recoverable	MO AVG	0.043	mg/L	0.0047	mg/L
10/31/2020	1	Copper, total recoverable	DAILY MX	0.043	mg/L	0.0137	mg/L
11/30/2020	1	Solids, suspended percent removal	MO AV MN	36	%	85	%
12/31/2020	1	Oxygen, dissolved (DO)	INST MIN	5.9	mg/L	6	mg/L
12/31/2020	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	12.78	mg/L	9.2	mg/L
1/31/2021	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	25.5	mg/L	18.4	mg/L
1/31/2021	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	18.5	mg/L	9.2	mg/L
1/31/2021	1	Lead, total recoverable	MO AVG	0.0063	mg/L	0.0024	mg/L
1/31/2021	1	Lead, total recoverable	DAILY MX	0.0063	mg/L	0.0054	mg/L
2/28/2021	1	Nitrogen, Kjeldahl, total (as N)	DAILY MX	25.5	mg/L	18.4	mg/L
2/28/2021	1	Nitrogen, Kjeldahl, total (as N)	MO AVG	18.5	mg/L	9.2	mg/L
2/28/2021	1	Lead, total recoverable	DAILY MX	0.0063	mg/L	0.0054	mg/L
2/28/2021	1	Lead, total recoverable	MO AVG	0.0063	mg/L	0.0024	mg/L